

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

S.R., an individual,)	
)	CIVIL ACTION NO. 2:22-cv-2861
Plaintiff,)	
)	
v.)	
)	Chief Judge Algenon L. Marbley
)	Magistrate Judge Elizabeth Deavers
WYNDHAM HOTELS & RESORTS,)	
INC., et al.)	
)	
Defendants.)	
)	

**STIPULATION & NOTICE OF DISMISSAL WITHOUT PREJUDICE AS TO
DEFENDANTS WYNDHAM HOTEL & RESORTS, INC., SIX CONTINENTS HOTELS,
INC., & HOLIDAY HOSPITALITY FRANCHISING, LLC.**

Come now Plaintiff, by and through counsel, respectfully requests dismissal of all claims against Defendants Wyndham Hotel & Resorts, Inc., Six Continents Hotels, Inc., and Holiday Hospitality Franchising, LLC without prejudice pursuant to 41(a)(1)(a)(ii) of the Federal Rules of Civil Procedure. Each party will bear its own costs.

Plaintiff respectfully requests that all claims asserted in this action be dismissed without prejudice.

Dated: March 29, 2023

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	<p>(to seek admission pro hac vice) Cynthia G. Burnside (to seek admission pro hac vice) 1180 West Peachtree Street, NW Suite 1800 Atlanta, GA 30309 (404) 817-8500 John.hamrick@hklaw.com Cynthia.burnside@hklaw.com</p> <p>William N. Shepherd (to seek admission pro hac vice) 777 South Flagler Drive, Suite 1900 West Palm Beach, FL 33401 (561) 833-2000 William.shepherd@hklaw.com Attorneys for Defendants Holiday Hospitality Franchising, LLC and Six Continents Hotels, Inc.</p> <p><i>Attorneys for Defendants Holiday Hospitality Franchising, LLC and Six Continents Hotels, Inc.</i></p>
<p>HAHN LOESER & PARKS, LLP</p> <p><u>/s/ Michael R. Reed</u> Michael R. Reed (0063995) A.J. Hensel (0085340) Elise K. Yarnell (0093996) 65 East State Street, Suite 1400 Columbus, Ohio 43215 Tel: (614) 233-5165 Email: mreed@hahnlaw.com ajhensel@hahnlaw.com eyarnell@hahnlaw.com</p> <p>David S. Sager (<i>pro hac vice forthcoming</i>) DLA Piper LLP (US) 51 John F. Kennedy Parkway, Suite 120 Short Hills, New Jersey 07078 Tel: (973) 520-2550 Email: David.sager@us.dlapiper.com</p> <p>Melissa A. Reinckens (<i>pro hac vice forthcoming</i>) DLA Piper LLP (US)</p>	

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CERTIFICATE OF SERVICE

I hereby certify that this document, through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this 29th day of March, 2023.

/s/ Steven C. Babin, Jr.

Steven C. Babin, Jr.

Attorney for Plaintiff